

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

League of Women Voters of Minnesota
Education Fund, Vivian Latimer
Tanniehill,

Civil No. 0:20-cv-01205 (ECT/TNL)

Plaintiffs,

v.

Steve Simon, in his official capacity as
Secretary of State of Minnesota,

Defendant.

**DECLARATION OF
HILLARY TAYLOR IN SUPPORT OF
DEFENDANT'S RESPONSE TO
PROPOSED INTERVENOR'S
OBJECTIONS TO PARTIAL
CONSENT DECREE**

I, HILLARY A. TAYLOR, declare under penalty of perjury:

1. I am an Assistant Attorney General for the State of Minnesota and represent Secretary of State Steve Simon in this action.

2. I make this declaration in good faith based on my personal knowledge of the facts set forth herein and on documents that are publicly available, but provided here for the convenience of the Court and the parties.

3. The Minnesota Department of Health has been gathering and publishing daily data about the impact of COVID-19 on our state. That information is available at a webpage called "Situation Update for the Coronavirus Disease 2019 (COVID-19)," at <https://www.health.state.mn.us/diseases/coronavirus/situation.html>. I visited that page on June 22 after 11:00 a.m., when it is updated, and reviewed the "deaths data table" (<https://www.health.state.mn.us/diseases/coronavirus/situation.html#death1>), which reflected 1,384 total deaths and 636 new deaths since Plaintiffs filed their Complaint. I also reviewed the "hospitalization data table" (<https://www.health.state.mn.us/diseases/coronavirus/situation.html#hospitalization>).

us/diseases/coronavirus/situation.html#hosp1), which shows that 332 Minnesotans are hospitalized as of June 22, 2020, and 3,830 Minnesotans have required hospitalization overall. Finally, the data shows that 33,227 Minnesotans have tested positive for COVID-19 as of June 22, 2020.

4. Attached as Exhibit 1 is a true and correct copy of World Health Organization's website publication *Coronavirus Overview*, printed June 22, 2020, available online at www.who.int/health-topics/coronavirus#tab=tab_1.

5. Attached as Exhibit 2 is a true and correct copy of the Minnesota Department of Health website publication, *About Coronavirus Disease 2019 (COVID-19)*, printed June 22, 2020, www.health.state.mn.us/diseases/coronavirus/basics.html.

6. Attached as Exhibit 3 is a true and correct copy of the World Health Organization Director-General's opening remarks at the media briefing on COVID-19 on March 11, 2020, available online at www.who.int/dg/speeches/detail/who-director-general-s-opening-remarks-at-the-media-briefing-on-covid-19---11-march-2020.

7. The U.S. Centers for Disease Control and Prevention gathers and publishes data each day about the impact of COVID-19 on our country. That information is available online at <https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/cases-in-us.html>. I visited that website after 11:00 a.m. on June 22, 2020, and it identified 119,615 total deaths in the United States from COVID-19 since January 22, 2020. Attached as Exhibit 4 is a true and correct copy of the website printed on June 22, 2020.

8. Attached as Exhibit 5 is a true and correct copy of Donald J. Trump, Proclamation on Declaring a National Emergency Concerning the Novel Coronavirus

Disease (COVID-19) Outbreak, March 13, 2020, available online at www.whitehouse.gov/presidential-actions/proclamation-declaring-national-emergency-concerning-novel-coronavirus-disease-covid-19-outbreak/.

9. Attached as Exhibit 6 is a true and correct copy of Coleman, J., *All 50 States Under Disaster Declaration for First Time in US History*, The Hill, Apr. 12, 2020, <https://thehill.com/policy/healthcare/public-global-health/492433-all-50-states-under-disaster-declaration-for-first>.

10. Attached as Exhibit 7 is a true and correct copy of Emergency Executive Order 20-01 (Mar. 13, 2020), available online at <https://www.leg.state.mn.us/archive/execorders/20-01.pdf>.

11. Attached as Exhibit 8 is a true and correct copy of the U.S. Center for Disease Control and Prevention's online publication *How COVID-19 Spreads*, printed June 22, 2020, available online at <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/how-covid-spreads.html>.

12. Attached as Exhibit 9 is guidance provided to County Election Administrators sent on June 19, 2020, regarding the suspension of the Witness Requirement as applied to absentee and mail-in ballot voting, in compliance with the partial consent decree entered and approved in *LaRose v. Simon*, 62-CV-30-3149 (June 17, 2020).

FURTHER YOUR DECLARANT SAYETH NOT.

I declare under penalty of perjury that the foregoing is true and correct.

DATE: June 22, 2020

s/Hillary A. Taylor

HILLARY A. TAYLOR